REMARKS

This Amendment is filed concurrently with a Request for Continued Examination (RCE) and an extension for response within third month and the requisite fees.

At the outset, Applicant's representative wishes to thank Examiner Jarrett for his time and courtesy during the telephone interview of April 12, 2006, in which general issues relating to embodiments of the present invention were discussed in advanced of the filing of the present Amendment and RCE.

Claims 1-13, 15-32, 34-49, 51-67 and 69-72 were previously rejected under 35 U.S.C. §103(a) as being unpatentable over Primavera Project Planner – Planning and Control Guide Version 3.0 (19999) in view of Merant PVCS Tracker – Issue and Change Management Control Reviewer's Guide (August 2000) and Hurd II, U.S. Patent No. 6,222,535.

Amended claim 1 recites:

> enabling remote definition of one of an Issue, a Change Request and a Change Order, the Issue identifying a problem within an identified one of the defined plurality of tasks whose resolution is to be tracked and whose resolution is necessary for the identified task to be completed, the Change Request identifying at least one step to be taken pending authorization to resolve the Issue and the Change Order identifying authorized steps to resolve the Issue, wherein the identified at least one step to be taken to resolve the Issue is included in the Change Order when the Change Request is authorized;
>
> ...
>
> requiring remote definition and storage in the database of at least one second dependency relationship between the defined Issue, Change Request or Change Order and the identified task in such a manner that the defined one of the Issue, Change Request and Change Order is integrated into the hierarchy of tasks without changing the defined first dependencies.

The amended claimed method specifies that the identified step(s) to be taken to resolve the Issue is included in the Change Order when the Change Request is authorized. Support for this recitation may be found, for example, at page 13, lines 3-10. The amended claimed method also

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requires the definition and storage in the database of one or more second dependency relationship between the defined Issue, Change Request or Change Order and the identified task ..., the definition of at least one second dependency relationship between the Issue, Change Request or Change Order and the identified task in such a manner that the defined Issue, Change Request or Change Order is integrated into the hierarchy of tasks without changing the defined first dependencies. Failing a teaching or suggestion of such by the applied combination of references, the 35 USC §103(a) rejections must be reconsidered and withdrawn.

The Office acknowledges that newly cited Primavera does not teach defining and storing issues, change requests and change orders as claims, and points to Merant PVCS Tracker (hereafter, Merant) as providing that which is acknowledged to be missing from Primavera. Specifically, the Office points to Merant's Issue and Change Management Solution as teaching issues, change requests and change orders. However, it is respectfully submitted that the issues in Merant are not problems with an identified one of the plurality of hierarchically organized tasks, as required by the claim. Moreover, the issues in Merant are not, as required by claim 1, "integrated into the hierarchy of tasks", as required by claim 1. In this regard, the Examiner points to Merant at "Page 4, Bullet 6; change history, audit trail, etc.; Page 12" However, as may be seen therein, Page 4 Bullet 6 only discloses that PVCS Tracker "lets you link issues with other issues." Therefore, Merant does not, as asserted in the outstanding Office Action, enable remote definition of dependency relationships between the defined Issue, Change Request or Change Order and the identified task as claimed, but instead enables linking of one issue with another issue. There is no teaching or suggestion in Merant of integrating an issue, Change Request or Change Order into a hierarchy of tasks by enabling the definition of at least one second dependency relationship as claimed or by any other means or step. Merant, whether considered alone or in combination with

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Primavera, does not teach or suggest requiring the definition of second dependency relationships between the defined Issue, Change Request and Change Order and an identified task within a hierarchy of tasks, as required by claim 1. The change history and audit trail functionality pointed to by the Office at page 12 of Merant only keep track of changes made to an issue and maintain an audit trail of such changes from submission to resolution thereof, and do not teach or suggest, alone or in combination with Primavera, integrating an issue within a hierarchy of interdependent tasks, as required by claim 1. The applied combination, moreover, does not teach or suggest that step(s) identified in a Change Request are included in a Change Order when the Change Request is authorized, as also claimed herein.

The Office at page 7 of the outstanding Office Action acknowledges that Merant does not teach defining and storing a change order, and points to Hurd as providing the missing teachings and/or suggestions. Hurd, however, does not teach or suggest (alone or in combination with either or both of Primavera and Merant) enabling a definition of at least one second dependency relationship between the Change Order and the identified task, nor does Hurd teach or suggest any manner of integrating a Change Order into a hierarchy of tasks, and much less integrating the Change Order into the hierarchy of tasks without changing the defined first dependencies, again as required by claim 1. Hurd only discloses a method by which an issue's state changes from assigned to proposed and thereafter to accepted when the proposed solution is acceptable (see Fig. 4 and Column 6, lines 13-20. Hurd, whether considered singly or in combination with the other references, does not teach or suggest any Change Order and does not teach or suggest integrating such a change order into any hierarchy of tasks, as required by claim 1.

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Indeed, it is only the present application that teaches the claimed method of managing a project in which Issues, Change Requests and Change Orders may be remotely defined and integrated into a hierarchy of tasks without changing the dependencies between the hierarchically defined tasks. There are no teachings or suggestions in the applied combination of references that would lead one of ordinary skill in the art to a) define such Issues, Change Requests and Change Orders relative to the claimed hierarchically organized tasks, and b) require the definition and storage in the database of second dependency relationships between the defined Issues, Change Requests and Change Orders and a task within the hierarchy such that the Issues, Change Requests and Change Orders are integrated within the hierarchy without changing the first dependencies between tasks, as claimed. None of the secondary references teaches or suggests the integration or any functionality to maintain the first relationships between the defined tasks, even when the Issues, Change Requests and/or Change Orders are integrated within the hierarchy of tasks.
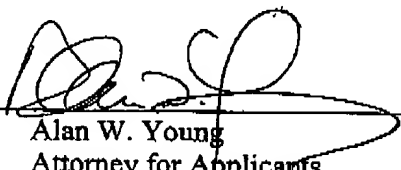
Independent claims 19, 37 and 55 include similar recitations and are believed to be patentable over the applied combination for the same reasons as were advanced above relative to claim 1. Such arguments, for brevity's sake, are not repeated here but are incorporated herein as if repeated in full.

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Applicants believe that this application is now in condition for allowance. If any unresolved

issues remain, please contact the undersigned attorney of record at the telephone number indicated

below and whatever is necessary to resolve such issues will be done at once.

Respectfully submitted,

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